

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

**UNITED STATES OF AMERICA**

**v.**

**ALI ABDULKADIR**

**Docket No. 2:19-cr-00173-DBH**

**MOTION FOR PROTECTIVE ORDER**

The United States of America, by and through its attorneys, Halsey B. Frank, United States Attorney, and Meghan E. Connelly, Assistant United States Attorney, hereby moves this Court for a protective order pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure pertaining to Jencks Act materials and *Giglio* materials to be produced in connection with the Government's discovery obligations. In support of this motion, the Government states as follows:

1. The Government intends to produce certain Jencks Act materials and *Giglio* materials to the defendant, including and not limited to audio recordings of Government witnesses.
2. The Government is concerned that further dissemination of these materials without a protective order may pose a danger to anticipated Government witnesses.
3. A protective order will allow for early production of these materials, while continuing to protect the availability and safety of the witnesses.
4. The Government seeks a protective order requiring that (1) defendant's counsel of record and counsel's assistants and agents shall not copy, reproduce, disseminate or otherwise disclose the discovery materials; and (2) the discovery materials shall at all times remain in the

custody of counsel, or an assistant, agent or investigator working under the supervision of counsel and that such materials shall not be provided to, or left with, the defendant.

WHEREFORE, the United States respectfully requests that this Court issue an order that any Jencks Act materials and *Giglio* materials provided by the Government to the defense shall not be further photocopied or otherwise reproduced and shall remain in the custody of defense counsel at all times.

Dated at Portland, Maine this 11<sup>th</sup> day of October, 2019.

Respectfully submitted,

Halsey B. Frank  
United States Attorney

/s/ Meghan E. Connelly  
Assistant United States Attorney  
United States Attorney's Office  
100 Middle Street  
Portland, Maine 04101  
(207) 780-3257  
Meghan.Connelly@usdoj.gov

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 11, 2019, I electronically filed Government's Motion for Protective Order with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Halsey B. Frank  
United States Attorney

/s/Meghan E. Connelly  
Assistant United States Attorney  
United States Attorney's Office  
100 Middle Street  
Portland, Maine 04101  
(207) 780-3257  
Meghan.connelly@usdoj.gov